



October 30, 2021

Richard Bridal
Illinois Commerce Commission
by E-mail

Dear Mr. Bridal,

Environmental Defense Fund (“EDF”) appreciates the opportunity to provide these written comments at the close of the ICC Workshops on Performance and Tracking Metrics, undertaken pursuant to the recently-enacted Climate and Equitable Jobs Act (“CEJA”), Public Act 102-0662. While the statutorily-mandated deadline for the close of the workshops presented unique challenges, EDF applauds the Commission for its flexibility in adding additional workshops beyond the originally-planned three, including one during evening hours, in response to public input and requests. Increasing transparency, inclusivity and accessibility of ICC proceedings where important decisions that impact energy and rates for every Illinois resident is a cornerstone of CEJA. EDF looks forward to additional processes where the ICC will continue to meet members of the public where they are in order to receive and consider informed input. As Illinois moves toward a decarbonized energy future, it is critical to have diverse voices, especially from communities that have not traditionally participated in Commission proceedings and have been disproportionately-burdened by utility plans, choices, rates and investments.

In general, EDF supports performance and tracking metrics that encourage utilities to affordably achieve climate and equity goals, particularly where the traditional regulatory compact would otherwise not incentivize utility actions to promote climate and equity. CEJA includes categories of metrics as well as high-level objectives that metrics should be designed to achieve. Those objectives include a particular emphasis on improved utility service, energy choice, health and wealth in environmental justice, low-income and equity investment eligible communities, and expressly addressing the burdens faced by customers in those communities. The objectives also require cost-effective clean energy investments, affordability for all customers, and equitable decarbonization. As the utilities design specific metrics under each category in the statute, and as the Commission evaluates those metrics, these overall objectives should be top-of-mind. Performance and tracking metrics should be designed to incentivize utilities to achieve those goals, to meaningfully evaluate their progress, and to align all utility investment planning decisions with those goals.

For all metrics, EDF supports metrics that specifically address challenges faced by low-income, environmental justice and equity-investment eligible communities. To that end, utilities

should track performance by location to ensure that priority communities actually see the improvements intended by the metrics. EDF also supports metrics that result in overall reductions to greenhouse gas emissions, reduced carbon intensity, and local air quality improvements. Communities that have been and continue to be disproportionately-impacted by the myriad health, economic and other impacts of local and regional pollution as well as global climate change must be prioritized for utility programs and investments that address those burdens. EDF supports ambitious peak-load reduction goals, which will result in achieving the goals of a number of metrics categories. EDF also supports the specific metrics proposed by Elevate during this process.

EDF looks forward to responding to the Staff's report and to working collaboratively with the ICC and stakeholders to put Illinois on track to meet the ambitious and achievable goals of CEJA.

Sincerely,

A handwritten signature in cursive script that reads "Christie Hicks".

Christie Hicks
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